

Hearing Date: August 4, 2010
Objection Deadline: August 2, 2010

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And Certain of its Affiliates and Subsidiaries

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

BEARINGPOINT, INC., et al.,

Debtors.

Chapter 11

Case No: 09-10691 (REG)

Jointly Administered

**RESPONSE OF VERIZON BUSINESS GLOBAL, LLC TO
LIQUIDATING TRUSTEE'S TWELFTH OMNIBUS
OBJECTION TO CLAIMS**

**TO: HONORABLE ROBERT E. GERBER
UNITED STATES BANKRUPTCY JUDGE**

Verizon Business Global, LLC and its subsidiaries Cybertrust Inc. and Digex Inc.
(collectively, "Verizon Business"), creditors of certain of the above-captioned Debtors,
by and through their undersigned attorneys, hereby respond¹ to the Liquidating
Trustee's Twelfth Omnibus Objection to Claims dated June 29, 2010 ("Objection")
which, inter alia, seeks to reduce Verizon Business' filed Claim No. 972 from the filed
amount of \$344,688.72 to the reduced amount of \$182,193.29, based upon certain

¹ McKool Smith P.C., counsel to the Liquidating Trustee, agreed to extend Verizon Business' response deadline until August 2, 2010.

payments allegedly made by the Debtors to Verizon Business since the February 18, 2009 "Commencement Date" of these chapter 11 cases, and respectfully state as follows:

1. On the Commencement Date, the Debtors commenced the captioned chapter 11 cases in the United States Bankruptcy Court for the Southern District of New York.

2. The Objection states that Verizon Business' Claim No. 972 has been reduced due to the Debtors' payment to Verizon Business of "\$162,475.43 . . . [by] check #s 80001399,80002609,80002497,80001900, 80000497 & 80000498 on 4/3/2009, 5/1/2009, 4/29/2009, 4/15/2009, 3/9/2009 & 3/9/2009, respectively." Objection, Exhibit A, p. 16.

3. Of the six payments identified in the Objection, Verizon Business appears to have confirmed that four payments to Cybertrust Inc. were received, subject to final reconciliation.² However, Verizon Business cannot presently confirm that Check Nos. 80000497 and 80000498, which appear to be payable to Digex Inc., were received. Verizon Business has requested that the Liquidating Trustee provide copies of these checks in order to facilitate reconciliation. However, the Liquidating Trustee has not yet provided same.

² Verizon Business reserves all rights with respect to the full amount of its \$344,688.72 Claim No. 972 until such time as it has completed its final reconciliation of its accounts with the Debtor, and nothing set forth in this response shall be deemed to waive or prejudice any part of said Claim.

4. Accordingly, Verizon Business submits that the Objection should be denied or adjourned with respect to Verizon Business' Claim No. 972 until such time as the Trustee provides the requested information and Verizon Business has completed its final reconciliation of its accounts with the Debtors.

CONCLUSION

WHEREFORE, Verizon Business respectfully submits that the Court should deny or adjourn the Objection with respect to Verizon Business' Claim No. 972 until such time as the Trustee provides the requested information and Verizon Business has completed its final reconciliation of its accounts with the Debtors.

Dated: August 2, 2010

GIBBONS P.C.

Attorneys for Verizon Business Global,
LLC and its Subsidiaries
Cybertrust Inc. and Digex Inc.

By: s/Dale E. Barney
Dale E. Barney